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**UNITED STATES DISTRICT COURT  
DISTRICT OF MINNESOTA**

In re: GUIDANT CORP  
IMPLANTABLE  
DEFIBRILLATORS PRODUCTS  
LIABILITY LITIGATION

MDL NO. 05-1708 (DWF/AJB)

This Application related to:

MICHAEL HALL,

Case No: 0:07-CV-2757-DWF/AJB

Plaintiff,

v.

GUIDANT CORPORATION, et al.,

Defendants.

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**APPLICATION TO WITHDRAW AS COUNSEL OF RECORD  
FOR PLAINTIFF MICHAEL HALL**

Pursuant to Rule 83.7(c) of the Local Rules of the United States District Court for the District of Minnesota, counsel for Michael Hall, Michael K. Johnson and Lucia J. W. McLaren of Goldenberg & Johnson, PLLC, and Joseph Crosby of The Crosby Law Office seek to withdraw as counsel for Michael Hall for the following reasons:

Counsel has made several attempts to locate Plaintiff. Counsel had a skip trace done in November, 2007 to locate Plaintiff. This proved successful, and counsel maintained contact with Plaintiff until February, 2008. Another skip trace was initiated in March, 2008 after counsel was unable to contact Plaintiff again. No home address or phone number exists for Plaintiff at this time. As we have been unsuccessful in locating Plaintiff, we do not want to jeopardize our remaining clients' claims in the pending settlement of this matter.

Date: May 2, 2008

Respectfully submitted,

GOLDENBERG & JOHNSON, PLLC

s/ Michael K. Johnson

Michael K. Johnson (MN ID# 258696)  
Lucia J. W. McLaren (MN ID# 0388088)  
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AND

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**CERTIFICATE OF SERVICE**

GUIDANT CORPORATION, et al.,

Defendants.

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I hereby certify that on May 2, 2008 I caused the following document:

**1. MOTION TO WITHDRAW AS COUNSEL OF RECORD**

to be filed electronically with the Clerk of Court through ECF and that ECF will send an electronic notice of the filing to the following attorneys:

- **Joseph M Crosby**  
jcrosby@crosby-law.com, rramsey@crosby-law.com
- **Michael K Johnson**  
mkjohnson@goldenberglaw.com, ljmclaren@goldenberglaw.com

I further certify that I caused a copy of the foregoing documents and the notice of electronic filing to be mailed by first class mail, postage paid, to the following non-ECF participants:

Jeffery N Luthi  
Room G-255 N Lobby  
Clerk of the Panel  
Thurgood Marshall Federal Judiciary Bldg  
One Columbus Circle NE  
Washington, DC 20002-8004

Dated: May 2, 2008

s/ Michael K. Johnson  
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